

From: Shayna E. Sacks <SSacks@NapoliLaw.com>
Sent: Wednesday, October 23, 2024 12:11 PM
To: Matthew.Hooker@alston.com; Brian.Boone@alston.com;
Optum.Opioid.Team@alston.com; ESI-Opioids; David R. Cohen
(David@SpecialMaster.Law)
Cc: Sofia Hernandez; Hunter Shkolnik; Salvatore C. Badala; Frank Gallucci;
pbm@listserv.motleyrice.com; PBM@listserv.motleyrice.com; Paul@farrellfuller.com;
PWeinberger@spanglaw.com; jrice@motleyrice.com; Jayne Conroy
Subject: In re Nat'l Prescription Opiate Litig., No. 17-md-2804 - certification of litigation hold
information for PBM cases (Napoli Shkolnik)
Attachments: 20240813 Updated Notice of Litigation Hold Data (doc 5589) (2).pdf

[EXTERNAL EMAIL from ssacks@napolilaw.com]



This message needs your attention

- This is their first email to esi-opioids@quinnemanuel.com.

Dear Special Master Cohen and PBM Defense Counsel,

Pursuant to the Court's order entered October 4, 2024, the directive made by the Court at the October 17, 2024 conference, and in relation to the attached list of pending PBM cases set forth in Doc 5589, Napoli Shkolnik provides the following notice.

Counsel for the following Ohio and New York plaintiffs re-certify that a notice of litigation hold was sent and implemented on the dates indicated in Doc 5589:

- *City of Ogdensburg v. Purdue Pharma, L.P., et al.*, No. 1:19-op-45852 (Napoli Shkolnik)
- *City of Auburn v. Purdue Pharma, L.P., et al.*, No. 1:19-op-45843 (Napoli Shkolnik)
- *Allegany County v. Purdue Pharma, L.P., et al.*, No. 1:19-op-46151 (Napoli Shkolnik)
- *Broadview Heights, OH, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *City of Euclid, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *City of Findlay, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *Garfield Height, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *Lorain County, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *Olmsted Falls, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *Parma Heights, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *City of Parma, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *Seven Hills, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *City of Warren, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)

Counsel for the following Ohio plaintiffs re-certify that a notice of litigation hold was sent and implemented, however make the following edits to the dates indicated on Doc 5589:

- *County of Cuyahoga, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
 - *Litigation Hold Implementation – 2/20/2018*

- *City of Dayton, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
 - *Litigation Hold Notice* – 2/20/2018
- *North Olmsted, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
 - *Litigation Hold Implementation* – 8/24/2018
- *North Ridgeville, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
 - *Litigation Hold Notice* – 8/15/2018
- *Painesville Township, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
 - *Litigation Hold Implementation* – 9/7/2018
- *Sandusky County, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
 - *Litigation Hold Implementation* – 6/11/2018
- *City of Strongsville, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
 - *Litigation Hold Notice* – 8/15/2018
- *City of Toledo, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
 - *Litigation Hold Implementation* – 3/1/2018

The following New York and Ohio plaintiffs plan to dismiss their actions against the PBM defendants:

- *County of Ashtabula, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *Harrison County, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *Jefferson County, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *City of Lorain, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *Warrenville Heights, et al. v. Mylan Pharmaceuticals, et al.*, No. 1:23-op-45003 (Napoli Shkolnik)
- *City of Amsterdam v. Purdue Pharma, L.P., et al.*, No. 1:19-op-46162 (Napoli Shkolnik)
- *City of Saratoga Springs v. Purdue Pharma, L.P., et al.*, No. 1:19-op-45857 (Napoli Shkolnik)

Shayna E. Sacks
Partner

Shayna E. Sacks

Partner

Admitted in: NY, NJ, CT



**NAPOLI
SHKOLNIK PLLC**
ATTORNEYS AT LAW

(212) 397-1000 | SSacks@NapoliLaw.com

360 Lexington Avenue, Eleventh Floor, New York, NY 10017 | [vCard](#)

[Our Mission Statement](#)

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

This e-mail and all other electronic (including voice) communications from the sender's firm are for informational purposes only. No such communication is intended by the sender to constitute either an electronic record or an electronic signature, or to constitute any agreement by the sender to conduct a transaction by electronic means. Any such intention or agreement is hereby expressly disclaimed unless otherwise specifically indicated.